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*EX PARTE*

*Electronic Filing via ECFs*

May 21, 2007

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

RE: *In the Matter of Developing a Unified Intercarrier Compensation  
Regime*, CC Docket No. 01-92

Dear Ms. Dortch:

Qwest hereby echoes and supports the *ex parte* letter filed in this proceeding on May 8, 2007 by Alltel Communications, Inc., Cavalier Communications, COMPTEL, General Communication, Inc. ("GCI"), iBasis, McLeodUSA Telecommunications Services, Inc., National Cable & Telecommunications Association, New Global Telecom, NuVox Communications, One Communications Corp., Pac-West Telecomm, Inc., RCN Telecom Services, Inc., The Voice on the Net (VON) Coalition, Time Warner Telecom, T-Mobile U.S.A., Inc., USA Datanet, Verizon and XO Communications, LLC (hereafter "Alltel, *et al.*").

In that letter, Alltel, *et al.*, representing broad segments of the telecommunications industry, stated their common support for the basic concept that call labeling and signaling rules should require interconnected common carriers to pass to each other, without alteration, information necessary for billing. This diverse group also reiterated their opposition to both the Missoula Plan and the Interim Phantom Traffic Solution and Uniform Process for the Exchange of Call Detail Records proposed by the Missoula Plan Proponents (the "Missoula Phantom Traffic Proposal"). At the same time, Alltel, *et al.*, acknowledged that all the signatories to the letter did not agree on every aspect of Phantom Traffic reform.

Likewise, Qwest does not agree with Alltel, *et al.*, on every aspect of Phantom Traffic reform. With respect to Qwest's detailed positions, Qwest does not attempt to restate those here, but instead continues to rely on its prior filings in this docket.<sup>1</sup> However, the basic principles

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<sup>1</sup> See, e.g., Qwest *expartes*, CC Docket No. 01-92, filed Mar. 16, 2007 (and attached thereto Mar. 15, 2007 Phantom Traffic presentation at 3, 5), Feb. 6, 2006 (and attached thereto Feb. 2, 2006 Phantom Traffic presentation at 5 of 7) and Feb. 3, 2006 (and attached thereto

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stated in the Alltel, *et al.*, letter regarding call labeling/signaling and opposition to the Missoula Phantom Traffic Proposal are all consistent with Qwest's advocacy as well. Indeed, the specific criticisms by Alltel, *et al.*, of the Missoula Phantom Traffic Proposal track in many respects with the detailed criticisms Qwest has already filed with respect to the Missoula Phantom Traffic Proposal.<sup>2</sup> Thus, as Alltel, *et al.*, state in their letter, it is clear that the Missoula Phantom Traffic Proposal is not supported in any way by a consensus of the industry. Rather, a diverse cross-section of the industry opposes the Missoula Phantom Traffic Proposal.

Finally, like Alltel, *et al.*, Qwest looks forward to the opportunity to participate in the Federal Communications Commission ("Commission") process to resolve particular problems with the current scheme for intercarrier compensation reform in a way that benefits consumers, encourages the deployment of new technologies, allows competitive markets to develop and more closely matches the problem.

This submission is made pursuant to Sections 1.49(f) 2nd 1.1206(b) of the rules of the Commission, 47 C.F.R. §§ 1.49(f), 1.1206(b).

If you have any questions, please call me on 303-383-6608.

Respectfully,

/s/Timothy M. Boucher

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Feb. 2, 2006 Phantom Traffic presentation at 5 of 7); Comments of Qwest Communications International Inc., CC Docket No. 01-92, filed Oct. 25, 2006 at 35 ("Qwest Oct. 25 Comments") (among other things, noting, with respect to call signaling rules, that intermediate carriers should only be obligated to pass on what they receive without alteration).

<sup>2</sup> See Qwest Oct. 25 Comments and Comments of Qwest Communications International Inc., CC Docket No. 01-92, filed Dec. 7, 2006.